UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

IKEIE SMITH #369273,

NO. 1:22-cv-925

Plaintiff,

v

HON. PAUL L. MALONEY

RAY RUBLEY, LLOYD BLACKMAN, LIZA MOYER, GARY STUMP, and BRANDON WELCH, MAG. JUDGE PHILLIP J. GREEN

Defendants.

Joshua S. Goodrich (P83197)

Attorney for Plaintiff

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MDOC DEFENDANTS' MOTION IN LIMINE REGARDING RULE 609 IMPEACHMENT ON CONVICTIONS AND MISCONDUCT HEARING $\underline{FINDINGS}$

MDOC Defendants, through the undersigned counsel, bring this motion in limine to address the issue of impeachment evidence with regard to convictions and misconduct hearing findings on the grounds set forth in the accompanying brief.

Counsel for Defendants spoke with Plaintiff's via email on June 6, 2025 and June 9, 2025, regarding this motion and he indicated that he will be filing an opposition brief and does not concur in the requested relief.

Respectfully submitted,

/s/Adam P. Sadowski
Adam P. Sadowski (P73864)
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Date: June 9, 2025

CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2025, I electronically filed the above document with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

/s/Adam P. Sadowski Adam P. Sadowski (P73864) Assistant Attorney General Attorney for MDOC Defendants